

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

STEPHEN C. GRATZ)	
)	
Plaintiff,)	
)	
v.)	<u>Case No. 3:18-cv-645-REP</u>
)	
)	
DIANE GRATZ a/k/a)	
DIANA GRATZ)	
)	
Defendant.)	
)	

DECLARATION OF STEPHEN C. GRATZ

I, Stephen C. Gratz, under penalty of perjury, do hereby depose and testify as follows:

1. I have personal knowledge of the facts stated below in this Declaration. I am over the age of 18 years, and am competent to testify concerning the matters herein.
2. I am the Plaintiff in this action.
3. On September 21, 2018, I filed my complaint against Diane Gratz (“Diane”) in this matter. On January 22, 2019, I filed an amended complaint. Prior to filing, I reviewed both my original complaint and my amended complaint. The amended complaint is a truthful and accurate statement of the facts as I know them and is based upon personal knowledge.

4. I affirm that the facts stated in my amended complaint, which are restated and incorporated herein by reference, are truthful and accurate to the best of my knowledge and belief, based upon my personal knowledge and experience, documents

and records in my possession, my personal interactions with George Otto Gratz (“George”), and emails, text messages, documents and information in my possession.

5. I have reviewed my Memorandum in Opposition to Diane’s motion to dismiss to which this Declaration will be attached. I affirm that the facts stated in my Opposition are truthful and accurate to the best of my knowledge and belief.

In accordance with 28 U.S.C. § 1746, I declare, certify, verify, and state under penalty of perjury that the foregoing is true and correct.

Executed in Charlottesville, Virginia, on February 22, 2019.

/s/ Stephen C. Gratz

STEPHEN C. GRATZ